

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America

v.

Ronald Laban Segars

Case No. Case: 2:20-mj-30533  
Assigned To : Unassigned  
Assign. Date : 12/21/2020  
USA V. SEGARS (CMP)(CMC)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 14, 2020 in the county of Wayne in the  
Easter District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. §922(g)(1)	Felon in Possession of a Ammunition

This criminal complaint is based on these facts:

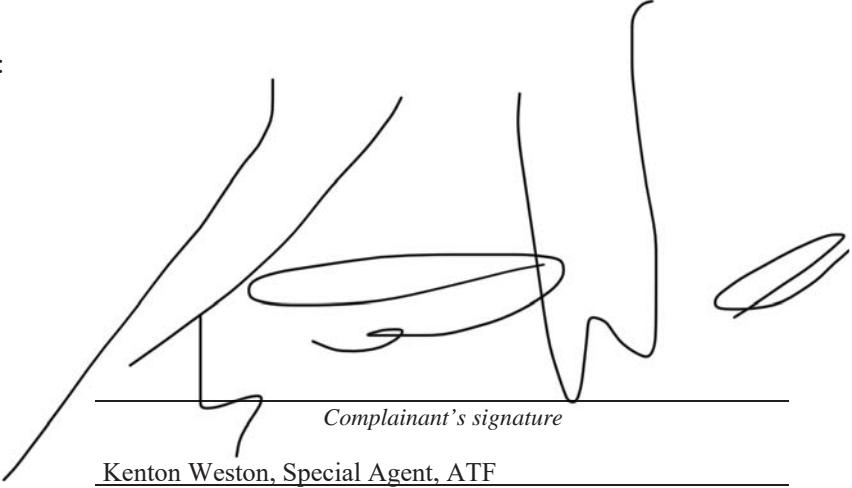
See attached Affidavit

Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: December 21, 2020

City and state: Detroit, Michigan

  
Complainant's signature

Kenton Weston, Special Agent, ATF

Printed name and title



Judge's signature

Hon. R. Steven Whalen, United States Magistrate Judge

Printed name and title

## INTRODUCTION

I, Special Agent Kenton Weston, being first duly sworn, hereby depose and state as follows:

1. I have personal knowledge of the facts set forth in this affidavit with the exception of the matters expressly stated to be based upon information and belief.

2. I make this affidavit with personal knowledge based on my participation in this investigation, including witness interviews by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

3. I have been employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) since January 2018. I am currently assigned to the Detroit Field Division, Crime Gun Enforcement Team (CGET) where I am tasked with investigating violations of federal firearms laws. I have been involved in dozens of

investigations involving violations of federal firearms laws, which have resulted in the seizure of hundreds of firearms. In addition, I have graduated the Federal Law Enforcement Training Center, and ATF Special Agent Basic Training.

4. I am currently conducting a criminal investigation concerning Ronald SEGARS (B/M, xx/xx/1971) for a violation of 18 U.S.C. § 922(g)(1) (prohibited person in possession of ammunition).

**Elements of 18 U.S.C. § 922(g)(1)**

5. The elements of a violation of 18 U.S.C. § 922(g)(1) are as follows:
- a. The defendant, following conviction of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed ammunition.
  - b. At the time of the defendant's possession of the ammunition, the defendant knew that he had been convicted of a crime punishable by imprisonment for a term exceeding one year.
  - c. The ammunition crossed a state line prior to the alleged possession.

**SEGARS's Criminal History**

6. SEGARS has multiple prior felony convictions, including the following:

- a. 1996 – Attempt – Felony Weapons (Michigan 3<sup>rd</sup> Judicial Circuit).
- b. 2006 – Felony Weapons; Felony Controlled Substance (Michigan 3<sup>rd</sup> Judicial Circuit)
- c. 2017 – Conspiracy to Distribute Heroin; Felon In Possession of Firearms (United States District Court for the Eastern District of Michigan)

7. SEGARS knows that he has been convicted of a crime punishable by imprisonment for a term exceeding one year because he has actually served multiple terms of imprisonment exceeding one year. Relating to his 2006 convictions, SEGARS was sentenced to a two-year prison term. Relating to his 2017 federal convictions, on December 21, 2017, SEGARS was sentenced to a 60 months term of imprisonment.

8. In May 2020, following more than a year of time in prison, SEGARS filed a motion with the Court seeking compassionate release. On June 15, 2020, the Court granted SEGARS compassionate release and

placed him on supervised release. SEGARS was released from prison that same day. His term of supervised release remained active at the time of the shooting detailed below.

**SEGARS's Possession of Ammunition**

9. On December 14, 2020, the Detroit Police Department (DPD) investigated the shooting of two adult women at a residence they shared with SEGARS. DPD learned from the two victims (hereinafter "Victim 1" and "Victim 2"), who have so far survived the shooting, that SEGARS was arguing with Victim 1 on the first floor of the home, and began pulling her by the hair. Victim 2, who had been upstairs, began down the stairs and shouted at SEGARS to stop and that the police were being called. SEGARS then produced a handgun, and fired it approximately eight times at the victims, hitting each of them multiple times. SEGARS then went outside the residence and shot a firearm approximately three more times. Subsequently, DPD conducted a search of the residence and recovered approximately eight .40 firearm cartridge cases in the area where SEGARS was shooting at the victims, including, but not limited to, a Winchester brand .40 fired cartridge case.

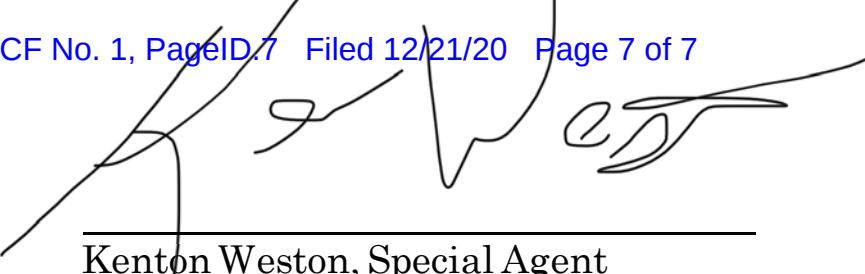
10. DPD arrested SEGARS that same evening, and he has been

charged by the State of Michigan with a series of offenses relating to the shootings, including Assault With Intent to Murder each of Victims 1 and 2.

11. ATF Interstate Nexus Expert Special Agent David Salazar was provided a verbal description of a fired Winchester .40 cartridge case recovered by DPD from the December 14, 2020, shooting. Based on the verbal description, Special Agent Salazar advised that the recovered fired Winchester .40 cartridge case was from readily available commercial ammunition and, due to the fact no commercially manufactured Winchester .40 ammunition is created in the State of Michigan, that ammunition had therefore traveled in and affected interstate commerce.

### **Conclusion**

12. Based on the above information, I have probable cause to believe that Ronald SEGARS, a prior convicted felon, was in possession of the above-described ammunition, and said ammunition has previously travelled in foreign or interstate commerce in violation of Title 18 U.S.C., Sec. 922(g)(1). This violation occurred within the Eastern District of Michigan.



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Kenton Weston, Special Agent  
Bureau of Alcohol, Tobacco, Firearms  
and Explosives

Sworn to before me and signed in my presence  
And/or by reliable electronic means



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Hon. R. Steven Whalen  
United States Magistrate Judge

Dated: December 21, 2020